



November 5, 2010

Water Docket  
Environmental Protection Agency  
Mailcode: 28221T  
1200 Pennsylvania, Ave. N.W.  
Washington, D.C. 20460

**NOV 08 2010**

Re: Chesapeake Bay Watershed – TMDL Process (EPA-R03-OW-2010-0736)

Dear Sir or Madam:

On behalf of the Harrisonburg-Rockingham Chamber of Commerce, I am writing this letter in support of our agricultural and business interests with regards to our concern over the Chesapeake Bay Watershed Total Maximum Daily Load (TMDL) process. The Chesapeake Bay has been and remains an important environmental and economic asset to the East Coast of the United States.

The agricultural community has taken and continues to take voluntary steps to reduce runoff and mitigate environment impacts from farming. In fact, our Chamber recognizes a farm family each year for their stewardship and sustainable agricultural practices. Much of agriculture is also already regulated by state agencies. Municipal and industrial wastewater treatment plants in the Valley have spent tens of millions of dollars to reduce their nutrient discharges. Developers have implemented storm water and erosion control practices.

Voluntarily, more can and will be done to improve water quality. However, the proposed TMDL and associated mandates will impose new regulatory burdens that will have a devastating economic impact upon Virginia, and the Shenandoah Valley in particular. The economic harm would be counterproductive to Bay restoration goals by depriving the private and public sectors with resources for continuing environmental progress.

EPA's comment period is much too brief for a measure of this magnitude. The proposed TMDL consists of well over a thousand pages including appendices. Much of this material is highly technical and complicated. It is unreasonable to expect citizens to analyze and understand such a massive measure and file informed comments within such a brief period of time. EPA itself should have provided a comprehensive economic impact analysis and presented it as part of the hearing process.


At our last Public Policy Committee meeting, it was noted that EPA may not have followed the process and requirements spelled out in the Clean Water Act for developing a TMDL. The agency is taking measures which are reserved for states under the Act, and inappropriately mandating state actions.

Harrisonburg-Rockingham Chamber of Commerce  
800 Country Club Road • Harrisonburg, Virginia 22802  
(540) 434-3862 • Fax: (540) 434-4508  
E-mail: [information@hrchamber.org](mailto:information@hrchamber.org) • [www.hrchamber.org](http://www.hrchamber.org)

**NOV 05 2010**

The Harrisonburg-Rockingham Chamber of Commerce is proud of the environmental stewardship efforts made by our members. EPA should reconsider its present course and work cooperatively with Virginia and other Bay jurisdictions to continue the significant strides already made to improve the Bay without imposing new and costly regulatory burdens.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Tamberrino", with a long horizontal flourish extending to the right.

Frank Tamberrino, President  
Harrisonburg-Rockingham Chamber of Commerce

CC:   Congressman Goodlatte  
      Senator Warner  
      Senator Webb